



WWW.RIVKINRADLER.COM

926 RXR Plaza
Uniondale, NY 11556-0926
T 516.357.3000 F 516.357.3333

STEVEN T. HENESY
Partner
(516) 357-3308
Steven.henesy@rivkin.com

December 19, 2022

By ECF

Honorable Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Insurance Company, et al. v. Zaitsev, M.D. et al.*
Docket No. 20-cv-03495-FB-SJB

Dear Judge Bulsara:

We represent Plaintiffs (collectively “GEICO” or “Plaintiffs”) in the above-referenced matter. Together with counsel for all remaining Defendants, we jointly and respectfully write to request of a short extension of approximately two weeks to complete expert discovery in this case. In particular, the parties respectfully request that the Court amend the expert discovery deadlines as follows:

- Deadline to serve affirmative expert reports extended from December 30, 2022 to January 17, 2023;
- Deadline to serve rebuttal expert reports extended from January 30, 2023 to February 17, 2023; and
- Deadline to complete all discovery, including expert depositions, extended from March 2, 2023 to March 17, 2023.

This request is made jointly and for good cause. The parties continue to work diligently to complete their expert reports and finalize them for service. Plaintiffs intend to serve four expert reports. Due to the approaching holidays and travel schedules of both counsel and Plaintiffs’ experts, the Parties require and respectfully request an additional two weeks to finalize their reports with their experts, for the remaining deadlines to be extended in that same fashion. We are mindful of the fact that the Court has recently extended these deadlines, and appreciate the Court’s accommodations as the Parties prepare this matter for dispositive motion practice.

We appreciate the Court's time and continued attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Steven T. Henesy
Steven T. Henesy

cc: All counsel via ECF